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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a), and
2 Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued by this
3 Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly
5 situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain documents under
6 seal related to their Opposition to Defendant Zuffa, LLC’s Motion to Seal Portions of Plaintiffs’ Reply
7 in Support of Plaintiffs’ Motion for Class Certification and Related Materials (ECF No 557) (the
8 “Opposition”).

9 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
10 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
11 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the
12 Party claiming protection shall file motion to seal setting forth the bases for sealing and proper authority
13 under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other applicable
14 authority.”

15 Plaintiffs seek leave to lodge under seal portions of the Opposition that relate to materials Zuffa
16 has designated Confidential or Highly Confidential – Attorneys’ Eyes Only under the Protective Order.

17 Plaintiffs seek leave to lodge under seal portions of Exhibit 1 to the Declaration of Kevin E.
18 Rayhill (the “Rayhill Declaration”) that relate to materials Zuffa has designated Confidential or Highly
19 Confidential – Attorneys’ Eyes Only under the Protective Order.

20 Plaintiffs seek leave to lodge under seal Exhibits 18 and 19 to the Rayhill Declaration, which were
21 designated Confidential by Zuffa pursuant to the Protective Order.

22 Plaintiffs have filed all of these documents under seal. Plaintiffs have publicly filed placeholders
23 for redacted versions of these documents with the Court, and will serve un-redacted versions of these
24 documents on Defendant.

1 Dated: June 19, 2018

Respectfully Submitted,
JOSEPH SAVERI LAW FIRM, INC.

3 By: /s/Kevin E. Rayhill
Kevin E. Rayhill

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2018 true and correct copies of the following documents were served via the District of Nevada's ECF system to all counsel of record who have enrolled in the ECF system:

- **PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL;**
- **PROPOSED ORDER.**

By:

/s/ Kevin E. Rayhill